

1 The Honorable Marsha J. Pechman  
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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

9 TRAVIS MICELSON, DANIELLE H. )  
10 MICELSON, and the marital community )  
11 thereof, )  
12 v. )  
13 CHASE HOME FINANCE, LLC, an unknown )  
14 entity; JPMORGAN CHASE BANK, N.A., a )  
15 foreign corporation; MORTGAGE )  
16 ELECTRONIC REGISTRATION SYSTEMS, )  
17 INC., a foreign corporation; NORTHWEST )  
18 TRUSTEE SERVICES, INC., a domestic )  
19 corporation; CHICAGO TITLE, an unknown )  
20 corporation; ROUTH CRABTREE OLSEN, )  
21 P.S., a domestic Personal Services Corporation; )  
22 FEDERAL HOME LOAN MORTGAGE )  
23 CORPORATION, a corporation; JEFF )  
24 STENMAN, and JANE DOE STENMAN, )  
individually, and the marital community )  
comprised thereof; VONNIE MCELLIGOTT )  
and JOHN DOE MCELLIGOTT, individually, )  
and the marital community comprised thereof; )  
RHEA S. PRE and JOHN DOE PRE, )  
individually, and the marital community )  
comprised there; and ROBOSIGNERS DOE 1- )  
10; )  
Defendants. )  
\_\_\_\_\_  
25 )  
26 )

**I. ANSWER**

COME NOW, Defendants Northwest Trustee Services, Jeff Stenman, Vonnie McElligott, and Rhea Pre (collectively, "NWTS Defendants") and Routh Crabtree Olsen,

1 P.S. (“RCO”) (NWTS Defendants and RCO are collectively referred to as “Answering  
 2 Defendants”) and hereby answers Plaintiff’s Amended Complaint (“FAC”) as follows. All  
 3 allegations not expressly admitted, denied, or otherwise pled below are hereby to be  
 4 construed as denied.

5 1.1 Answering Defendants lack sufficient information or belief to either admit or deny  
 6 the allegations in this paragraph and therefore deny them.

7 1.2 Deny.

8 1.3 This paragraph contains legal conclusions to which Answering Defendants are not  
 9 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 10 information to admit or deny the allegations and on this basis deny them.

11 1.4 This paragraph contains legal conclusions to which Answering Defendants are not  
 12 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 13 information to admit or deny the allegations and on this basis deny them.

14 1.5 This paragraph contains legal conclusions to which Answering Defendants are not  
 15 required to respond and other statements to which no response is required. To the extent an  
 16 answer is required, Answering Defendants lack sufficient information to admit or deny the  
 17 allegations and on this basis deny them.

18 1.6 This paragraph contains legal conclusions to which Answering Defendants are not  
 19 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 20 information to admit or deny the allegations and on this basis deny them.

21 2.1 Answering Defendants lack sufficient information or belief to either admit or deny  
 22 the allegations in this paragraph and therefore deny them.

23 2.2 Answering Defendants lack sufficient information or belief to either admit or deny  
 24 the allegations in this paragraph and therefore deny them.

25 2.3 Answering Defendants assert that the Note and Deed of Trust speak for themselves. To  
 26 the extent an further answer is required, Answering Defendants lack sufficient information to  
 admit or deny the allegations and on this basis deny them.

1       2.4     Answering Defendants assert that the Deed of Trust speaks for itself. To the extent an  
 2 further answer is required, Answering Defendants lack sufficient information to admit or deny  
 3 the allegations and on this basis deny them.

4       2.4.1    Admit.

5       2.5     Admit.

6       2.5.1    Answering Defendants assert that the Limited Power of Attorney speaks for itself.

7       2.5.2    Answering Defendants assert that the Assignment of Deed of Trust speaks for itself.

8       2.5.3    Answering Defendants assert that the Appointment of Successor Trustee speaks for  
 9 itself.

10      2.5.4    Answering Defendants assert that the 2008 Notice of Trustee's Sale speaks for itself.

11      2.5.5    Answering Defendants assert that the 2010 Notice of Trustee's Sale speaks for itself.

12      2.6     Admit.

13      2.7     This paragraph contains legal conclusions to which Answering Defendants are not  
 14 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 15 information to admit or deny the allegations and on this basis deny them.

16      2.8     Answering Defendants lack sufficient information to admit or deny the allegations and  
 17 on this basis deny them.

18      2.9     This paragraph contains legal conclusions to which Answering Defendants are not  
 19 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 20 information to admit or deny the allegations and on this basis deny them.

21      2.9.1    This paragraph contains legal conclusions to which Answering Defendants are not  
 22 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 23 information to admit or deny the allegations and on this basis deny them.

24      2<sup>nd</sup> 2.9.1    Answering Defendants lack sufficient information to admit or deny the  
 25 allegations and on this basis deny them.

26      2.9.3    Answering Defendants lack sufficient information to admit or deny the allegations and  
 on this basis deny them.

1 2.10 Admit.

2 2.10.1 Answering Defendants lack sufficient information to admit or deny the allegations and  
3 on this basis deny them.

4 2.10.2 This paragraph is unintelligible as written. To the extent an answer is required,  
5 Answering Defendants lack sufficient information to admit or deny the allegations and on this  
6 basis deny them.

7 2.10.3 Deny.

8 2.11 Answering Defendants lack sufficient information to admit or deny the allegations and  
9 on this basis deny them.

10 2.12 This paragraph includes legal conclusions to which Answering Defendants are not  
11 required to respond. RCO admits it is a law firm and professional services corporation  
12 principally based in Bellevue, WA and doing business in Island County. RCO admits attorney  
13 Heidi Buck appeared on its behalf. Answering Defendants deny all remaining allegations  
14 contained in this paragraph.

15 2.13 This paragraph includes legal conclusions to which Answering Defendants are not  
16 required to respond. Answering Defendants admit Jeff Stenman is a resident of Washington and  
17 employed by NWTS.

18 2.14 This paragraph includes legal conclusions to which Answering Defendants are not  
19 required to respond. Answering Defendants admit Vonnie McElligott is a resident of  
20 Washington and employed by NWTS.

21 2.15 This paragraph includes legal conclusions to which Answering Defendants are not  
22 required to respond. Answering Defendants admit Rhea Pre is a resident of Washington and  
23 employed by NWTS.

24 2.16 Answering Defendants lack sufficient information to admit or deny the allegations and  
25 on this basis deny them.

26 2.18<sup>1</sup> Admit this court has jurisdiction.

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<sup>1</sup> The FAC does not contain a Paragraph 2.17.

1       3.1     Answering Defendants re-state responses to each and every item and allegation  
2     above.

3       3.2     Answering Defendants lack sufficient information to admit or deny the allegations and  
4     on this basis deny them.

5       3.3     Answering Defendants assert that the Note speaks for itself. The statements in this  
6     paragraph are statements that do not warrant a denial or admission from Answering  
7     Defendants.

8       3.4     This paragraph contains legal conclusions to which Answering Defendants are not  
9     required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
10    information to admit or deny the allegations and on this basis deny them.

11      3.5     Answering Defendants lack sufficient information to admit or deny the allegations and  
12     on this basis deny them.

13      3.6     Answering Defendants assert that the Deed of Trust speaks for itself.

14      3.7     Answering Defendants lack sufficient information to admit or deny the allegations and  
15     on this basis deny them.

16      3.8     This paragraph contains legal conclusions to which Answering Defendants are not  
17     required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
18     information to admit or deny the allegations and on this basis deny them.

19      3.8.1    Answering Defendants assert that the Deed of Trust speaks for itself. This paragraph  
20     contains legal conclusions to which Answering Defendants are not required to respond. To  
21     the extent an answer is required, Answering Defendants lack sufficient information to admit or  
22     deny the allegations and on this basis deny them.

23      3.8.2    Answering Defendants assert that the Note speaks for itself. This paragraph contains  
24     legal conclusions to which Answering Defendants are not required to respond. To the extent  
25     an answer is required, Answering Defendants lack sufficient information to admit or deny the  
26     allegations and on this basis deny them.

1 3.8.3 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
3 information to admit or deny the allegations and on this basis deny them.

4 3.8.4 This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
6 information to admit or deny the allegations and on this basis deny them.

7 3.8.5 This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
9 information to admit or deny the allegations and on this basis deny them.

10 3.8.6 This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
12 information to admit or deny the allegations and on this basis deny them.

13 3.9 This paragraph contains legal conclusions to which Answering Defendants are not  
14 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
15 information to admit or deny the allegations and on this basis deny them.

16 3.9.1 This paragraph contains legal conclusions to which Answering Defendants are not  
17 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
18 information to admit or deny the allegations and on this basis deny them.

19 3.9.2 Answering Defendants lack sufficient information to admit or deny the allegations and  
20 on this basis deny them.

21 3.9.3 Answering Defendants lack sufficient information to admit or deny the allegations and  
22 on this basis deny them.

23 3.9.4 This paragraph contains legal conclusions to which Answering Defendants are not  
24 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
25 information to admit or deny the allegations and on this basis deny them.

26 3.10 Admit.

1 3.11 Answering Defendants lack sufficient information to admit or deny the allegations and  
2 on this basis deny them.

3 3.12 Answering Defendants lack sufficient information to admit or deny the allegations and  
4 on this basis deny them.

5 3.13 Answering Defendants lack sufficient information to admit or deny the allegations and  
6 on this basis deny them.

7 3.14 Answering Defendants lack sufficient information to admit or deny the allegations and  
8 on this basis deny them.

9 3.15 This paragraph contains statements that do not warrant a denial or admission from  
10 Answering Defendants and legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
12 information to admit or deny the allegations and on this basis deny them.

13 3.16 Answering Defendants assert that the Limited Power of Attorney speaks for itself.

14 3.17 Answering Defendants assert that the Appointment of Successor Trustee speaks for  
15 itself. Answering Defendants admit Jeff Stenman and Rhea Pre are employees of NWTS.

16 3.18 Answering Defendants assert that the Assignment of Deed of Trust speaks for itself.  
17 Answering Defendants admit Vonnie McElligott and Rhea Pre are employees of NWTS.

18 3.19 This paragraph contains legal conclusions to which Answering Defendants are not  
19 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
20 information to admit or deny the allegations and on this basis deny them.

21 3.20 This paragraph contains legal conclusions to which Answering Defendants are not  
22 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
23 information to admit or deny the allegations and on this basis deny them.

24 3.21 Answering Defendants lack sufficient information to admit or deny the allegations and  
25 on this basis deny them.

26

1 3.22 Answering Defendants admit the Mickelson defaulted on their loan. Answering  
2 Defendants lack sufficient information to admit or deny the remaining allegations and on this  
3 basis deny them.

4 3.23 RCO asserts that the 2008 Letter, notice of default, and notice of sale speaks for  
5 themselves. Answering Defendants lack sufficient information to admit or deny the remaining  
6 allegations and on this basis deny them.

7 3.24 Answering Defendants deny the Appointment and Assignment were recorded after the  
8 notice of sale.

9 3.25 Answering Defendants lack sufficient information or belief to either admit or deny  
10 the allegations in this paragraph and therefore deny them.

11 3.26 Answering Defendants assert the 2010 Notice of Sale and Note speak for themselves.

12 3.27 Denied.

13 3.28 NWTS admits it conducted the sale on March 25, 2011. Answering Defendants assert  
14 the Trustee's Deed speaks for itself. Answering Defendants lack sufficient information to  
15 admit or deny the remaining allegations and on this basis deny them.

16 3.29 To the extent this paragraph states a legal conclusion, Answering Defendants are not  
17 required to answer. Answering Defendants deny the allegations in this paragraph.

18 3.30 RCO admits it was retained by Freddie Mac to represent it in the unlawful detainer  
19 action. Answering Defendants assert the unlawful detainer complaint speaks for itself.  
20 Answering Defendants lack sufficient information to admit or deny the remaining allegations  
21 and on this basis deny them.

22 3.31 Answering Defendants lack sufficient information to admit or deny the allegations and  
23 on this basis deny them.

24 3.32 Answering Defendants lack sufficient information to admit or deny the allegations and  
25 on this basis deny them.

26 3.33 Answering Defendants lack sufficient information to admit or deny the allegations and  
on this basis deny them.

1 3.34 Answering Defendants lack sufficient information to admit or deny the allegations and  
2 on this basis deny them.

3 3.35 Answering Defendants lack sufficient information to admit or deny the allegations and  
4 on this basis deny them.

5 3.36 Answering Defendants lack sufficient information to admit or deny the allegations and  
6 on this basis deny them.

7 3.37 Answering Defendants lack sufficient information to admit or deny the allegations and  
8 on this basis deny them.

9 3.38 Answering Defendants lack sufficient information to admit or deny the allegations and  
10 on this basis deny them.

11 3.39 Answering Defendants lack sufficient information to admit or deny the allegations and  
12 on this basis deny them.

13 4.1 Answering Defendants re-state responses to each and every item and allegation  
14 above.

15 4.2 This paragraph contains legal conclusions to which Answering Defendants are not  
16 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
17 information to admit or deny the allegations and on this basis deny them.

18 5.1 Answering Defendants re-state responses to each and every item and allegation  
19 above.

20 5.2 Answering Defendants assert the Note speaks for itself.

21 5.3 The statements in this paragraph are statements that do not warrant a denial or  
22 admission from Answering Defendants.

23 5.4 This paragraph contains legal conclusions to which Answering Defendants are not  
24 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
25 information to admit or deny the allegations and on this basis deny them.

1 5.5 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
3 information to admit or deny the allegations and on this basis deny them.

4 5.6 This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
6 information to admit or deny the allegations and on this basis deny them.

7 5.7 This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
9 information to admit or deny the allegations and on this basis deny them.

10 5.8 Answering Defendants lack sufficient information to admit or deny the allegations and  
11 on this basis deny them.

12 6.1 Answering Defendants re-state responses to each and every item and allegation  
13 above.

14 6.2 The statements in this paragraph are statements that do not warrant a denial or  
15 admission from Answering Defendants.

16 6.3 Answering Defendants assert the Deed of Trust speaks for itself.

17 6.4 This paragraph contains legal conclusions and statements that do not warrant a denial  
18 or admission from Answering Defendants. To the extent an answer is required, Answering  
19 Defendants lack sufficient information to admit or deny the allegations and on this basis deny  
20 them.

21 6.5 Answering Defendants assert the Deed of Trust speaks for itself.

22 6.6 This paragraph contains legal conclusions to which Answering Defendants are not  
23 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
24 information to admit or deny the allegations and on this basis deny them.

25 6.6.1 This paragraph contains legal conclusions to which Answering Defendants are not  
26 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
information to admit or deny the allegations and on this basis deny them.

1 6.6.2 Answering Defendants lack sufficient information to admit or deny the allegations and  
2 on this basis deny them.

3 6.6.3 Answering Defendants lack sufficient information to admit or deny the allegations and  
4 on this basis deny them.

5 6.6.4 This paragraph contains legal conclusions to which Answering Defendants are not  
6 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
7 information to admit or deny the allegations and on this basis deny them.

8 6.7 Answering Defendants lack sufficient information to admit or deny the allegations and  
9 on this basis deny them.

10 6.8 This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
12 information to admit or deny the allegations and on this basis deny them.

13 6.9 This paragraph contains legal conclusions to which Answering Defendants are not  
14 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
15 information to admit or deny the allegations and on this basis deny them.

16 6.10 This paragraph contains legal conclusions to which Answering Defendants are not  
17 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
18 information to admit or deny the allegations and on this basis deny them.

19 6.11 This paragraph contains legal conclusions to which Answering Defendants are not  
20 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
21 information to admit or deny the allegations and on this basis deny them.

22 6.12 Answering Defendants assert the Deed of Trust speaks for itself. To the extent an  
23 answer is required, Answering Defendants lack sufficient information to admit or deny the  
24 allegations and on this basis deny them.

25 6.13 This paragraph contains legal conclusions to which Answering Defendants are not  
26 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
information to admit or deny the allegations and on this basis deny them.

1 6.14 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
3 information to admit or deny the allegations and on this basis deny them.

4 6.15 Answering Defendants assert the Deed of Trust speaks for itself.

5 6.16 This paragraph contains legal conclusions to which Answering Defendants are not  
6 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
7 information to admit or deny the allegations and on this basis deny them.

8 6.17 This paragraph contains legal conclusions to which Answering Defendants are not  
9 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
10 information to admit or deny the allegations and on this basis deny them.

11 6.18 This paragraph contains legal conclusions to which Answering Defendants are not  
12 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
13 information to admit or deny the allegations and on this basis deny them.

14 6.19 This paragraph contains legal conclusions to which Answering Defendants are not  
15 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
16 information to admit or deny the allegations and on this basis deny them.

17 6.20 This paragraph contains legal conclusions to which Answering Defendants are not  
18 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
19 information to admit or deny the allegations and on this basis deny them.

20 6.21 This paragraph contains legal conclusions to which Answering Defendants are not  
21 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
22 information to admit or deny the allegations and on this basis deny them.

23 6.22 Answering Defendants assert the Assignment of Deed of Trust speaks for itself. This  
24 paragraph contains legal conclusions to which Answering Defendants are not required to  
25 respond. To the extent an answer is required, Answering Defendants lack sufficient information  
26 to admit or deny the allegations and on this basis deny them.

1 6.23 Answering Defendants assert the Assignment of Deed of Trust speaks for itself. This  
 2 paragraph contains legal conclusions to which Answering Defendants are not required to  
 3 respond. To the extent an answer is required, Answering Defendants lack sufficient information  
 4 to admit or deny the allegations and on this basis deny them.

5 6.24 This paragraph contains legal conclusions to which Answering Defendants are not  
 6 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 7 information to admit or deny the allegations and on this basis deny them.

8 6.25 The statements in this paragraph are statements that do not warrant a denial or  
 9 admission from Answering Defendants.

10 6.26 Admit.

11 6.27 Admit. Answering Defendants assert the Limited Power of Attorney speaks for itself.

12 6.28 This paragraph contains legal conclusions to which Answering Defendants are not  
 13 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 14 information to admit or deny the allegations and on this basis deny them.

15 6.29 This paragraph contains legal conclusions to which Answering Defendants are not  
 16 required to respond. To the extent an answer is required, Answering Defendants deny the  
 17 allegations of this paragraph.

18 6.30 This paragraph contains legal conclusions to which Answering Defendants are not  
 19 required to respond. To the extent an answer is required, Answering Defendants deny the  
 20 allegations of this paragraph.

21 6.31 Answering Defendants assert the Appointment of Successor Trustee and Limited  
 22 Power of Attorney speak for themselves. This paragraph contains legal conclusions to which  
 23 Answering Defendants are not required to respond. To the extent an answer is required,  
 24 Answering Defendants deny the allegations of this paragraph.

25 6.32 This paragraph contains legal conclusions to which Answering Defendants are not  
 26 required to respond. To the extent an answer is required, Answering Defendants deny the  
 allegations of this paragraph.

1 6.33 Answering Defendants assert the Deed of Trust speaks for itself.

2 6.34 The statements in this paragraph are statements that do not warrant a denial or  
3 admission from Answering Defendants.

4 6.35 The statements in this paragraph are statements that do not warrant a denial or  
5 admission from Answering Defendants.

6 6.36 This paragraph contains legal conclusions to which Answering Defendants are not  
7 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
8 information to admit or deny the allegations and on this basis deny them.

9 6.37 This paragraph contains legal conclusions to which Answering Defendants are not  
10 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
11 information to admit or deny the allegations and on this basis deny them.

12 6.38 This paragraph contains legal conclusions to which Answering Defendants are not  
13 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
14 information to admit or deny the allegations and on this basis deny them.

15 6.39 This paragraph contains legal conclusions to which Answering Defendants are not  
16 required to respond. To the extent an answer is required, Answering Defendants deny the  
17 allegations of this paragraph.

18 6.40 This paragraph contains legal conclusions to which Answering Defendants are not  
19 required to respond. To the extent an answer is required, Answering Defendants deny the  
20 allegations of this paragraph.

21 6.41 This paragraph contains legal conclusions to which Answering Defendants are not  
22 required to respond. To the extent an answer is required, Answering Defendants deny the  
23 allegations of this paragraph.

24 6.42 The statements in this paragraph are statements that do not warrant a denial or  
25 admission from Answering Defendants.

26 6.42.1 The statements in this paragraph are statements that do not warrant a denial or  
admission from Answering Defendants.

1 6.42.2 The statements in this paragraph are statements that do not warrant a denial or  
2 admission from Answering Defendants.

3 2<sup>nd</sup> 6.42 This paragraph contains legal conclusions to which Answering Defendants are  
4 not required to respond. To the extent an answer is required, Answering Defendants lack  
5 sufficient information to admit or deny the allegations and on this basis deny them.

6 6.43 Denied.

7 6.44 This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants deny the  
9 allegations of this paragraph.

10 6.45 This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants deny the  
12 allegations of this paragraph.

13 6.46 This paragraph contains legal conclusions to which Answering Defendants are not  
14 required to respond. To the extent an answer is required, Answering Defendants deny the  
15 allegations of this paragraph.

16 6.47 This paragraph contains legal conclusions to which Answering Defendants are not  
17 required to respond. To the extent an answer is required, Answering Defendants deny the  
18 allegations of this paragraph.

19 6.48 The statements in this paragraph are statements that do not warrant a denial or  
20 admission from Answering Defendants.

21 6.49 The statements in this paragraph are statements that do not warrant a denial or  
22 admission from Answering Defendants.

23 6.50 This paragraph contains legal conclusions to which Answering Defendants are not  
24 required to respond. To the extent an answer is required, Answering Defendants deny the  
25 allegations of this paragraph.

26

1 6.51 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants deny the  
3 allegations of this paragraph.

4 6.52 This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants deny the  
6 allegations of this paragraph.

7 6.53 This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants deny the  
9 allegations of this paragraph.

10 6.54 This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants deny the  
12 allegations of this paragraph.

13 6.55 The statements in this paragraph are statements that do not warrant a denial or  
14 admission from Answering Defendants.

15 6.56 This paragraph contains legal conclusions to which Answering Defendants are not  
16 required to respond.

17 6.57 Denied.

18 6.58 This paragraph contains legal conclusions to which Answering Defendants are not  
19 required to respond. To the extent an answer is required, Answering Defendants deny the  
20 allegations of this paragraph.

21 6.59 This paragraph contains legal conclusions to which Answering Defendants are not  
22 required to respond. To the extent an answer is required, Answering Defendants deny the  
23 allegations of this paragraph.

24 6.60 This paragraph contains legal conclusions to which Answering Defendants are not  
25 required to respond. To the extent an answer is required, Answering Defendants deny the  
26 allegations of this paragraph.

1 6.61 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants deny the  
3 allegations of this paragraph.

4 6.62 This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants deny the  
6 allegations of this paragraph.

7 6.63 This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
9 information to admit or deny the allegations and on this basis deny them.

10 6.64 This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants deny the  
12 allegations of this paragraph.

13 7.1 Answering Defendants re-state responses to each and every item and allegation  
14 above.

15 7.2 This paragraph contains legal conclusions to which Answering Defendants are not  
16 required to respond. To the extent an answer is required, Answering Defendants deny the  
17 allegations of this paragraph.

18 7.3 This paragraph contains legal conclusions to which Answering Defendants are not  
19 required to respond. To the extent an answer is required, Answering Defendants deny the  
20 allegations of this paragraph.

21 8.1 Answering Defendants re-state responses to each and every item and allegation  
22 above.

23 8.2 This paragraph contains legal conclusions to which Answering Defendants are not  
24 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
25 information to admit or deny the allegations and on this basis deny them.

26

1       8.3    This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
3 information to admit or deny the allegations and on this basis deny them.

4       8.4    This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
6 information to admit or deny the allegations and on this basis deny them.

7       8.5    The statements in this paragraph are statements that do not warrant a denial or  
8 admission from Answering Defendants.

9       9.1    Answering Defendants re-state responses to each and every item and allegation  
10 above.

11       9.2    This paragraph contains legal conclusions to which Answering Defendants are not  
12 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
13 information to admit or deny the allegations and on this basis deny them.

14       9.3    This paragraph contains legal conclusions to which Answering Defendants are not  
15 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
16 information to admit or deny the allegations and on this basis deny them.

17       9.4    This paragraph contains legal conclusions to which Answering Defendants are not  
18 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
19 information to admit or deny the allegations and on this basis deny them.

20       10.1   Answering Defendants re-state responses to each and every item and allegation  
21 above.

22       10.2   This paragraph contains legal conclusions to which Answering Defendants are not  
23 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
24 information to admit or deny the allegations and on this basis deny them.

25       10.3   This paragraph contains legal conclusions to which Answering Defendants are not  
26 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
information to admit or deny the allegations and on this basis deny them.

1 10.4 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
3 information to admit or deny the allegations and on this basis deny them.

4 10.5 This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
6 information to admit or deny the allegations and on this basis deny them.

7 10.6 This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
9 information to admit or deny the allegations and on this basis deny them.

10 10.7 This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
12 information to admit or deny the allegations and on this basis deny them.

13 10.8 This paragraph contains legal conclusions to which Answering Defendants are not  
14 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
15 information to admit or deny the allegations and on this basis deny them.

16 10.9 This paragraph contains legal conclusions to which Answering Defendants are not  
17 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
18 information to admit or deny the allegations and on this basis deny them.

19 10.10 This paragraph contains legal conclusions to which Answering Defendants are not  
20 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
21 information to admit or deny the allegations and on this basis deny them.

22 10.11 This paragraph contains legal conclusions to which Answering Defendants are not  
23 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
24 information to admit or deny the allegations and on this basis deny them.

25 10.12 This paragraph contains legal conclusions to which Answering Defendants are not  
26 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
information to admit or deny the allegations and on this basis deny them.

1 11.1 Answering Defendants re-state responses to each and every item and allegation  
2 above.

3 11.2 The statements in this paragraph are statements that do not warrant a denial or  
4 admission from Answering Defendants.

5 11.3 The statements in this paragraph are statements that do not warrant a denial or  
6 admission from Answering Defendants.

7 11.4 The statements in this paragraph are statements that do not warrant a denial or  
8 admission from Answering Defendants.

9 11.5 The statements in this paragraph are statements that do not warrant a denial or  
10 admission from Answering Defendants.

11 11.6 This paragraph contains legal conclusions to which Answering Defendants are not  
12 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
13 information to admit or deny the allegations and on this basis deny them.

14 11.7 This paragraph contains legal conclusions to which Answering Defendants are not  
15 required to respond. To the extent an answer is required, Answering Defendants deny the  
16 allegations of this paragraph.

17 11.8 This paragraph contains legal conclusions to which Answering Defendants are not  
18 required to respond. To the extent an answer is required, Answering Defendants deny the  
19 allegations of this paragraph.

20 11.9 The statements in this paragraph are statements that do not warrant a denial or  
21 admission from Answering Defendants.

22 11.10 This paragraph contains legal conclusions to which Answering Defendants are not  
23 required to respond. To the extent an answer is required, Answering Defendants deny the  
24 allegations of this paragraph.

25 11.11 The statements in this paragraph are statements that do not warrant a denial or  
26 admission from Answering Defendants.

1 11.12 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants deny the  
3 allegations of this paragraph.

4 11.13 This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants deny the  
6 allegations of this paragraph.

7 11.14 This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants deny the  
9 allegations of this paragraph.

10 11.15 This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants deny the  
12 allegations of this paragraph.

13 11.16 This paragraph contains legal conclusions to which Answering Defendants are not  
14 required to respond and statements that do not require an admission or denial from  
15 Answering Defendants. To the extent an answer is required, Answering Defendants deny the  
16 allegations of this paragraph.

17 11.17 This paragraph contains legal conclusions to which Answering Defendants are not  
18 required to respond. To the extent an answer is required, Answering Defendants deny the  
19 allegations of this paragraph.

20 11.18 This paragraph contains legal conclusions to which Answering Defendants are not  
21 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
22 information to admit or deny the allegations and on this basis deny them.

23 11.19 This paragraph contains legal conclusions to which Answering Defendants are not  
24 required to respond. To the extent an answer is required, Answering Defendants deny the  
25 allegations of this paragraph.

26

1 11.20 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants deny the  
3 allegations of this paragraph.

4 11.21 The statements in this paragraph are statements that do not warrant a denial or  
5 admission from Answering Defendants.

6 11.21.1 This paragraph contains legal conclusions to which Answering Defendants are  
7 not required to respond. To the extent an answer is required, Answering Defendants lack  
8 sufficient information to admit or deny the allegations and on this basis deny them.

9 11.21.2 This paragraph contains legal conclusions to which Answering Defendants are  
10 not required to respond. To the extent an answer is required, Answering Defendants lack  
11 sufficient information to admit or deny the allegations and on this basis deny them.

12 11.21.3 This paragraph contains legal conclusions to which Answering Defendants are  
13 not required to respond. To the extent an answer is required, Answering Defendants lack  
14 sufficient information to admit or deny the allegations and on this basis deny them.

15 11.22 This paragraph contains legal conclusions to which Answering Defendants are not  
16 required to respond. To the extent an answer is required, Answering Defendants deny the  
17 allegations of this paragraph.

18 11.22.1 This paragraph contains legal conclusions to which Answering Defendants are  
19 not required to respond. To the extent an answer is required, Answering Defendants lack  
20 sufficient information to admit or deny the allegations and on this basis deny them.

21 11.22.2 Answering Defendants assert the Appointment of Successor Trustee speaks  
22 for itself. This paragraph contains legal conclusions to which Answering Defendants are not  
23 required to respond. To the extent an answer is required, Answering Defendants deny the  
24 allegations of this paragraph.

25 11.22.3 This paragraph contains legal conclusions to which Answering Defendants are  
26 not required to respond. To the extent an answer is required, Answering Defendants deny the  
allegations of this paragraph.

1 11.23 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants deny the  
3 allegations of this paragraph.

4 12.1 Answering Defendants re-state responses to each and every item and allegation  
5 above.

6 12.2 This paragraph contains legal conclusions to which Answering Defendants are not  
7 required to respond and statements that do not warrant an admission or denial from  
8 Answering Defendants. To the extent an answer is required, Answering Defendants deny the  
9 allegations of this paragraph.

10 12.3 This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants deny the  
12 allegations of this paragraph.

13 12.4 The statements in this paragraph are statements that do not warrant a denial or  
14 admission from Answering Defendants.

15 12.5 This paragraph contains legal conclusions to which Answering Defendants are not  
16 required to respond. To the extent an answer is required, Answering Defendants deny the  
17 allegations of this paragraph.

18 12.6 This paragraph contains legal conclusions to which Answering Defendants are not  
19 required to respond and statements that do not warrant an admission or denial from  
20 Answering Defendants. To the extent an answer is required, Answering Defendants deny the  
21 allegations of this paragraph.

22 12.7 This paragraph contains legal conclusions to which Answering Defendants are not  
23 required to respond. To the extent an answer is required, Answering Defendants deny the  
24 allegations of this paragraph.

25 12.8 This paragraph contains legal conclusions to which Answering Defendants are not  
26 required to respond and statements that do not warrant an admission or denial from

1 Answering Defendants. To the extent an answer is required, Answering Defendants deny the  
2 allegations of this paragraph.

3 12.9 This paragraph contains legal conclusions to which Answering Defendants are not  
4 required to respond. To the extent an answer is required, Answering Defendants deny the  
5 allegations of this paragraph.

6 12.10 This paragraph contains legal conclusions to which Answering Defendants are not  
7 required to respond. To the extent an answer is required, Answering Defendants deny the  
8 allegations of this paragraph.

9 12.11 The statements in this paragraph are a request for relief that do not warrant a denial or  
10 admission from Answering Defendants.

11 13.1 Answering Defendants re-state responses to each and every item and allegation  
12 above.

13 13.2 This paragraph contains legal conclusions to which Answering Defendants are not  
14 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
15 information to admit or deny the allegations and on this basis deny them.

16 13.2A This paragraph contains legal conclusions to which Answering Defendants are not  
17 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
18 information to admit or deny the allegations and on this basis deny them.

19 13.2B This paragraph contains legal conclusions to which Answering Defendants are not  
20 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
21 information to admit or deny the allegations and on this basis deny them.

22 13.2C This paragraph contains legal conclusions to which Answering Defendants are not  
23 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
24 information to admit or deny the allegations and on this basis deny them.

25 13.2D This paragraph contains legal conclusions to which Answering Defendants are not  
26 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
information to admit or deny the allegations and on this basis deny them.

1 13.2E This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
3 information to admit or deny the allegations and on this basis deny them.

4 13.3 This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants deny the  
6 allegations of this paragraph.

7 13.4 The statements in this paragraph are statements that do not warrant a denial or  
8 admission from Answering Defendants.

9 13.4A This paragraph contains legal conclusions to which Answering Defendants are not  
10 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
11 information to admit or deny the allegations and on this basis deny them.

12 13.4B This paragraph contains legal conclusions to which Answering Defendants are not  
13 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
14 information to admit or deny the allegations and on this basis deny them.

15 13.4C This paragraph contains legal conclusions to which Answering Defendants are not  
16 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
17 information to admit or deny the allegations and on this basis deny them.

18 13.4D This paragraph contains legal conclusions to which Answering Defendants are not  
19 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
20 information to admit or deny the allegations and on this basis deny them.

21 13.4E This paragraph contains legal conclusions to which Answering Defendants are not  
22 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
23 information to admit or deny the allegations and on this basis deny them.

24 13.4F This paragraph contains legal conclusions to which Answering Defendants are not  
25 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
26 information to admit or deny the allegations and on this basis deny them.

13.4G This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
3 information to admit or deny the allegations and on this basis deny them.

13.4H This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
6 information to admit or deny the allegations and on this basis deny them.

13.4I This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
9 information to admit or deny the allegations and on this basis deny them.

13.4J This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
12 information to admit or deny the allegations and on this basis deny them.

13.4K This paragraph contains legal conclusions to which Answering Defendants are not  
14 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
15 information to admit or deny the allegations and on this basis deny them.

13.5 This paragraph contains legal conclusions to which Answering Defendants are not  
17 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
18 information to admit or deny the allegations and on this basis deny them.

13.5A This paragraph contains legal conclusions to which Answering Defendants are not  
20 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
21 information to admit or deny the allegations and on this basis deny them.

13.5B This paragraph contains legal conclusions to which Answering Defendants are not  
23 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
24 information to admit or deny the allegations and on this basis deny them.

13.5C This paragraph contains legal conclusions to which Answering Defendants are not  
26 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
information to admit or deny the allegations and on this basis deny them.

1 13.5D This paragraph contains legal conclusions to which Answering Defendants are not  
 2 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 3 information to admit or deny the allegations and on this basis deny them.

4 13.5E This paragraph contains legal conclusions to which Answering Defendants are not  
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 6 information to admit or deny the allegations and on this basis deny them.

7 13.5F This paragraph contains legal conclusions to which Answering Defendants are not  
 8 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 9 information to admit or deny the allegations and on this basis deny them.

10 13.5G This paragraph contains legal conclusions to which Answering Defendants are not  
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 12 information to admit or deny the allegations and on this basis deny them.

13 13.5H This paragraph contains legal conclusions to which Answering Defendants are not  
 14 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
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16 13.5I This paragraph contains legal conclusions to which Answering Defendants are not  
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 18 information to admit or deny the allegations and on this basis deny them.

19 13.5J This paragraph contains legal conclusions to which Answering Defendants are not  
 20 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 21 information to admit or deny the allegations and on this basis deny them.

22 13.5K This paragraph contains legal conclusions to which Answering Defendants are not  
 23 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
 24 information to admit or deny the allegations and on this basis deny them.

25 13.6 This paragraph contains legal conclusions to which Answering Defendants are not  
 26 required to respond. To the extent an answer is required, Answering Defendants deny the  
 allegations of this paragraph.

1 13.7 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
3 information to admit or deny the allegations and on this basis deny them.

4 13.8 This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants deny the  
6 allegations of this paragraph.

7 13.8A This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants deny the  
9 allegations of this paragraph.

10 13.8B This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants deny the  
12 allegations of this paragraph.

13 13.8C This paragraph contains legal conclusions to which Answering Defendants are not  
14 required to respond. To the extent an answer is required, Answering Defendants deny the  
15 allegations of this paragraph.

16 13.8D This paragraph contains legal conclusions to which Answering Defendants are not  
17 required to respond. To the extent an answer is required, Answering Defendants deny the  
18 allegations of this paragraph.

19 13.8E This paragraph contains legal conclusions to which Answering Defendants are not  
20 required to respond. To the extent an answer is required, Answering Defendants deny the  
21 allegations of this paragraph.

22 13.9 This paragraph contains legal conclusions to which Answering Defendants are not  
23 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
24 information to admit or deny the allegations and on this basis deny them.

25 13.9A This paragraph contains legal conclusions to which Answering Defendants are not  
26 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
information to admit or deny the allegations and on this basis deny them.

1 13.9B This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
3 information to admit or deny the allegations and on this basis deny them.

4 13.9C This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants lack sufficient  
6 information to admit or deny the allegations and on this basis deny them.

7 13.10 This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants deny the  
9 allegations of this paragraph.

10 13.11 This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond. To the extent an answer is required, Answering Defendants deny the  
12 allegations of this paragraph.

13 13.12 This paragraph contains legal conclusions to which Answering Defendants are not  
14 required to respond. To the extent an answer is required, Answering Defendants deny the  
15 allegations of this paragraph.

16 14.1 Answering Defendants re-state responses to each and every item and allegation  
17 above.

18 14.2 The statements in this paragraph are statements that do not warrant a denial or  
19 admission from Answering Defendants.

20 14.3 This paragraph contains legal conclusions to which Answering Defendants are not  
21 required to respond. To the extent an answer is required, Answering Defendants deny the  
22 allegations of this paragraph.

23 14.4 This paragraph contains legal conclusions to which Answering Defendants are not  
24 required to respond. To the extent an answer is required, Answering Defendants deny the  
25 allegations of this paragraph.

26

1 14.5 This paragraph contains legal conclusions to which Answering Defendants are not  
2 required to respond. To the extent an answer is required, Answering Defendants deny the  
3 allegations of this paragraph.

4 14.6 This paragraph contains legal conclusions to which Answering Defendants are not  
5 required to respond. To the extent an answer is required, Answering Defendants deny the  
6 allegations of this paragraph.

7 14.7 This paragraph contains legal conclusions to which Answering Defendants are not  
8 required to respond. To the extent an answer is required, Answering Defendants deny the  
9 allegations of this paragraph.

10 14.8 This paragraph contains legal conclusions to which Answering Defendants are not  
11 required to respond and statements that do not warrant an admission or denial from  
12 Answering Defendants. To the extent an answer is required, Answering Defendants deny the  
13 allegations of this paragraph.

14 15.1 Answering Defendants re-state responses to each and every item and allegation  
15 above.

16 15.2 The statements in this paragraph are statements that do not warrant a denial or  
17 admission from Answering Defendants.

18 15.3 This paragraph contains legal conclusions to which Answering Defendants are not  
19 required to respond and requests for relief which do not warrant an admission or denial from  
20 Answering Defendants. To the extent an answer is required, Answering Defendants deny the  
21 allegations of this paragraph.

22 **DAMAGES AND EQUITABLE RELIEF**

23 The statements in this paragraph are a request for relief which do not warrant an  
24 admission or denial from Answering Defendants. To the extent an answer is required,  
25 Answering Defendants deny the allegations of this paragraph.

**DEMAND FOR JURY TRIAL**

The statements in this paragraph are statements that do not warrant a denial or admission from Answering Defendants.

## **ANSWER TO APPENDIX I**

3.32.1 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them.

3.32.2 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them.

3.32.3 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them.

3.32.4 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them.

3.32.5 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them.

3.32.6 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them.

3.32.7 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them.

3.32.8 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them

3.32.9 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them

3.32.10 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them

3.32.11 Answering Defendants lack sufficient information or belief to either admit or deny the allegations in this paragraph and therefore deny them.

1 3.32.12 Answering Defendants admit they received one phone call from Plaintiffs on  
2 or about February 5, 2009. Answering Defendants lack sufficient information or belief to  
3 either admit or deny the remaining allegations in this paragraph and therefore deny them.

4 3.32.13 Answering Defendants lack sufficient information or belief to either admit or  
5 deny the allegations in this paragraph and therefore deny them.

6 3.32.14 Answering Defendants lack sufficient information or belief to either admit or  
7 deny the allegations in this paragraph and therefore deny them.

8 3.32.15 Answering Defendants lack sufficient information or belief to either admit or  
9 deny the allegations in this paragraph and therefore deny them.

10 3.32.16 Answering Defendants lack sufficient information or belief to either admit or  
11 deny the allegations in this paragraph and therefore deny them.

12 3.32.17 Answering Defendants lack sufficient information or belief to either admit or  
13 deny the allegations in this paragraph and therefore deny them.

14 3.32.18 Answering Defendants lack sufficient information or belief to either admit or  
15 deny the allegations in this paragraph and therefore deny them.

16 3.32.19 Answering Defendants lack sufficient information or belief to either admit or  
17 deny the allegations in this paragraph and therefore deny them.

18 3.32.20 Answering Defendants lack sufficient information or belief to either admit or  
19 deny the allegations in this paragraph and therefore deny them.

20 3.32.21 Answering Defendants lack sufficient information or belief to either admit or  
21 deny the allegations in this paragraph and therefore deny them.

22 3.32.22 Answering Defendants lack sufficient information or belief to either admit or  
23 deny the allegations in this paragraph and therefore deny them.

24 3.32.23 Answering Defendants lack sufficient information or belief to either admit or  
25 deny the allegations in this paragraph and therefore deny them.

26 3.32.24 Answering Defendants lack sufficient information or belief to either admit or  
deny the allegations in this paragraph and therefore deny them.

1 3.32.25 Answering Defendants lack sufficient information or belief to either admit or  
2 deny the allegations in this paragraph and therefore deny them.

3 3.32.26 Answering Defendants lack sufficient information or belief to either admit or  
4 deny the allegations in this paragraph and therefore deny them.

5 3.32.27 Answering Defendants lack sufficient information or belief to either admit or  
6 deny the allegations in this paragraph and therefore deny them.

7 3.32.28 Answering Defendants lack sufficient information or belief to either admit or  
8 deny the allegations in this paragraph and therefore deny them.

9 3.32.29 Answering Defendants lack sufficient information or belief to either admit or  
10 deny the allegations in this paragraph and therefore deny them.

11 3.32.30 Answering Defendants lack sufficient information or belief to either admit or  
12 deny the allegations in this paragraph and therefore deny them.

13 3.32.31 Answering Defendants lack sufficient information or belief to either admit or  
14 deny the allegations in this paragraph and therefore deny them.

15 3.32.32 Answering Defendants lack sufficient information or belief to either admit or  
16 deny the allegations in this paragraph and therefore deny them.

17 3.32.33 Answering Defendants lack sufficient information or belief to either admit or  
18 deny the allegations in this paragraph and therefore deny them.

19 3.32.34 Answering Defendants lack sufficient information or belief to either admit or  
20 deny the allegations in this paragraph and therefore deny them.

21 3.32.35 Answering Defendants lack sufficient information or belief to either admit or  
22 deny the allegations in this paragraph and therefore deny them.

23 3.32.36 Answering Defendants lack sufficient information or belief to either admit or  
24 deny the allegations in this paragraph and therefore deny them.

25 3.32.37 Answering Defendants lack sufficient information or belief to either admit or  
26 deny the allegations in this paragraph and therefore deny them.

1 3.32.38 Answering Defendants lack sufficient information or belief to either admit or  
 2 deny the allegations in this paragraph and therefore deny them.

3 3.32.39 Answering Defendants lack sufficient information or belief to either admit or  
 4 deny the allegations in this paragraph and therefore deny them.

5 3.32.40 Answering Defendants lack sufficient information or belief to either admit or  
 6 deny the allegations in this paragraph and therefore deny them.

7 3.32.41 Answering Defendants lack sufficient information or belief to either admit or  
 8 deny the allegations in this paragraph and therefore deny them.

9 3.32.42 Answering Defendants lack sufficient information or belief to either admit or  
 10 deny the allegations in this paragraph and therefore deny them.

11 3.32.43 Answering Defendants assert the August 6, 2010 letter speaks for itself.

12 3.32.44 Answering Defendants lack sufficient information or belief to either admit or  
 13 deny the allegations in this paragraph and therefore deny them.

14 3.32.45 Answering Defendants lack sufficient information or belief to either admit or  
 15 deny the allegations in this paragraph and therefore deny them.

16 3.32.46 Answering Defendants lack sufficient information or belief to either admit or  
 17 deny the allegations in this paragraph and therefore deny them.

18 3.32.47 Answering Defendants lack sufficient information or belief to either admit or  
 19 deny the allegations in this paragraph and therefore deny them.

20 3.32.48 Answering Defendants lack sufficient information or belief to either admit or  
 21 deny the allegations in this paragraph and therefore deny them.

22 3.32.49 Answering Defendants lack sufficient information or belief to either admit or  
 23 deny the allegations in this paragraph and therefore deny them.

24 3.32.50 Answering Defendants lack sufficient information or belief to either admit or  
 25 deny the allegations in this paragraph and therefore deny them.

26 3.32.51 Answering Defendants lack sufficient information or belief to either admit or  
 deny the allegations in this paragraph and therefore deny them.

1 3.32.52 Answering Defendants lack sufficient information or belief to either admit or  
2 deny the allegations in this paragraph and therefore deny them.

3 3.32.53 Answering Defendants lack sufficient information or belief to either admit or  
4 deny the allegations in this paragraph and therefore deny them.

5 3.32.54 Answering Defendants lack sufficient information or belief to either admit or  
6 deny the allegations in this paragraph and therefore deny them.

7 3.32.55 Answering Defendants lack sufficient information or belief to either admit or  
8 deny the allegations in this paragraph and therefore deny them.

9 3.32.56 Answering Defendants lack sufficient information or belief to either admit or  
10 deny the allegations in this paragraph and therefore deny them.

11 3.32.57 Answering Defendants lack sufficient information or belief to either admit or  
12 deny the allegations in this paragraph and therefore deny them.

13 3.32.58 Answering Defendants lack sufficient information or belief to either admit or  
14 deny the allegations in this paragraph and therefore deny them.

15 3.32.59 Answering Defendants admit they sent Plaintiffs a Notice of Postponement  
16 letter on or about February 18, 2011. Answering Defendants assert the February 18, 2011  
17 letter speaks for itself. As to the remaining allegations, Answering Defendants lack sufficient  
18 information or belief to either admit or deny the allegations in this paragraph and therefore  
19 deny them.

20 3.32.60 Answering Defendants lack sufficient information or belief to either admit or  
21 deny the allegations in this paragraph and therefore deny them.

22 3.32.61 Answering Defendants lack sufficient information or belief to either admit or  
23 deny the allegations in this paragraph and therefore deny them.

24 3.32.62 Answering Defendants lack sufficient information or belief to either admit or  
25 deny the allegations in this paragraph and therefore deny them.

1 3.32.63 Answering Defendants admit a notice was posted at the subject property on or  
 2 about March 25, 2011 providing notice that the foreclosure sale had occurred. As to all  
 3 remaining allegations, Answering Defendants lack sufficient information or belief to either  
 4 admit or deny the allegations in this paragraph and therefore deny them.  
 5

6 3.32.64 Answering Defendants lack sufficient information or belief to either admit or  
 7 deny the allegations in this paragraph and therefore deny them.  
 8

## II. AFFIRMATIVE DEFENSES

9 Having answer Plaintiff's FAC, Answering Defendants assert the following affirmative  
 10 defenses, the assertion of which in no way shifts the burden of proof to Answering Defendants:  
 11

- 12 1. Failure to State a Claim: The assertions in the FAC fail to state claims upon which relief  
 13 can be granted.
- 14 2. Failure of Damages: Plaintiffs cannot allege any cognizable damages resulting from the  
 15 acts alleged in the FAC.
- 16 3. Mitigation of Damages: Plaintiffs have failed to mitigate the alleged damages.
- 17 4. Waiver and Estoppel: Plaintiffs' claims are barred by the equitable doctrines of waiver  
 18 and estoppel.
- 19 5. Breach of Contract: Plaintiffs breached the Note and defaulted according to the Deed of  
 20 Trust by failing to make payment described in the Note and Deed of Trust.
- 21 6. Nonperformance of Condition Precedent: Plaintiffs breached the Note and defaulted  
 22 according to the Deed of Trust by failing to make payments described in the Note and  
 23 Deed of Trust.
- 24 7. Laches: The claims asserted in the FAC are barred in whole or in part by the equitable  
 25 doctrine of laches.

8. Contributory Fault/Unclean Hands: The claims asserted in the FAC are barred in whole or in part based on Plaintiffs' contributory fault and/or unclean hands.
9. Mootness. Plaintiffs' claims are moot and therefore barred at this time.
10. Statutory Exemption. The Plaintiffs' claim fall within an exemption from statutory coverage.
11. Insufficient service. Plaintiffs have failed to effect proper service of the FAC.
12. Answering Defendants also assert the defenses of assumption of risk, mutual mistake, and reserves the right to amend this Answer by way of adding additional affirmative defenses, counter claims, or third party claims as additional facts are discovered, without waiving defenses of lack of subject matter jurisdiction or any other valid defense.

## VI. PRAYER FOR RELIEF

Answering Defendants pray for judgment against Plaintiffs as follows:

1. That Plaintiffs' FAC be dismissed with prejudice;
2. That the Plaintiffs recover nothing on account of the claims made in the FAC.
3. That the Answering Defendant be awarded costs of suit herein; and
4. For such other and further relief as the Court deems equitable and just.

DATED this 10<sup>th</sup> day of May, 2012.

## **ROUTH CRABTREE OLSEN, P.S.**

/s/ Heidi E. Buck

Heidi E. Buck, WSBA #41769

Attorneys for Defendants Northwest Trustee Services, Inc., Jeff Stenman, Vonnie McElligott, Rhea Pre, and Routh Crabtree Olsen, P.S.

ANSWER  
2:11-cv-01445-MJP  
Page 37 of 39

**ROUTH  
CRABTREE  
OLSEN, P.S.**

## Declaration of Service

The undersigned makes the following declaration:

1. I am now, and at all times herein mentioned was a resident of the State of Washington, over the age of eighteen years and not a party to this action, and I am competent to be a witness herein.

2. That on May 10, 2012, I caused a copy of the **Answer of Defendants Northwest Trustee Services, Inc., Routh Crabtree Olsen, P.S., Jeff Stenman, Vonnie McElligott, and Rhea Pre** to be served to the following in the manner noted below:

<p>Scott E. Stafne          Andrew Krawczyk          Stafne Law Firm          239 N. Olympic Ave.          Arlington, WA 98223</p> <p>Attorneys for Plaintiffs</p>	<p><input checked="" type="checkbox"/> US Mail, Postage Prepaid  <input type="checkbox"/> Hand Delivery  <input type="checkbox"/> Overnight Mail  <input type="checkbox"/> Facsimile</p>
<p>Fred Burnside          Rebecca J. Francis          Davis Wright Tremaine, LLP          1201 Third Ave., Suite 2200          Seattle, WA 98101-3045</p> <p>Attorneys for Defendants JPMorgan Chase          Bank, N.A.; Chase Home Finance, LLC;          Mortgage Electronic Registration Systems, Inc.;          and Federal Home Loan Mortgage Corporation</p>	<p><input checked="" type="checkbox"/> US Mail, Postage Prepaid  <input type="checkbox"/> Hand Delivery  <input type="checkbox"/> Overnight Mail  <input type="checkbox"/> Facsimile</p>
<p>Erin M. Stines          Fidelity National Law Group          1200 6<sup>th</sup> Ave., Suite 4100          Seattle, WA 98101</p> <p>Attorneys for Defendant Chicago Title</p>	<p><input checked="" type="checkbox"/> US Mail, Postage Prepaid  <input type="checkbox"/> Hand Delivery  <input type="checkbox"/> Overnight Mail  <input type="checkbox"/> Facsimile</p>

1 I declare under penalty of perjury under the laws of the state of Washington that the  
2 foregoing is true and correct.

3 Signed this 10<sup>th</sup> day of May, 2012.  
4

5 /s/ Kristine Stephan

6 Kristine Stephan, Paralegal

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